

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA
Title III

No. 17 BK 3284-LTS

**JOINDER BY THE GMS GROUP, LLC TO PROSOL-UTIER MOTION IN LIMINE OR
TO STRIKE MRS. NATALIE JARESKO AND MR. DAVID M. BROWNSTEIN
DECLARATIONS (DOCKET ENTRIES NO. 4756 AND 4757 IN CASE NO. 17-03283)**

GODREAU & GONZALEZ LAW, LLC

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Attorneys for The GMS Group, LLC

Dated: January 15, 2019

The GMS Group, LLC (“GMS” or “Secured Creditor”), respectfully shows the Court as follows:

1. On December 21, GMS filed an “Amended Objection Of The GMS Group, LLC To Second Amended Title III Plan Of Adjustment Of Puerto Rico Sales Tax Financing Corporation And Request For Evidentiary Hearing” with supporting exhibits (the “GMS Objection”). *See, Docket 4564.*

2. On January 15, 2019, PROSOL-UTIER filed a “Motion In Limine or to Strike Mrs. Natalie Jaresko and Mr. David M. Brownstein Declarations (Docket Entries No. 4756 and 4757 in Case No. 17-03283)” (the “Motion to Strike”). *See, Docket 4790.*

3. In addition to, and without waiver or derogation of, the GMS Objection and the GMS Joinder, GMS hereby joins in and adopts the Motion to Strike and intends to raise the points, arguments and authorities contained therein at the hearing to consider confirmation of the Plan and objections thereto.

4. Therefore, GMS requests that the Court exclude the testimonies of Mrs. Natalie Jaresko and Mr. David Brownstein in their entirety. In the alternative, the specific assertions as presented in Tables 1 and 2 of Exhibit 3 should be excluded..

Dated: New York, New York

January 15, 2019

GODREAU & GONZALEZ LAW, LLC

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